

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NORTH DAKOTA

In re:)	Case No. 23-30132
)	(Chapter 11)
CHRISTOPHER WAYNE GLENN)	
)	
Debtor.)	

AMENDED DISCLOSURE

This is a Chapter 11 case originally filed on April 24, 2023, in which a plan of reorganization was confirmed nearly a year ago, on August 30, 2023. At no point during the pendency of this case did undersigned counsel receive any compensation for work herein other than that expressly disclosed—and expressly approved—by this Honorable Court. And at no point during the pendency of this case did undersigned counsel assume any representation(s) inconsistent with the declaration of disinterestedness filed at the time of the case’s commencement, DE #3-1.

However, insofar as a motion to amend the confirmed plan has now been filed, DE #117, the following two disclosures are appropriately made:

1. In July 2024, the now-reorganized debtor engaged undersigned counsel to provide representation in connection with certain post-confirmation matters. A retainer was paid shortly after a new engagement agreement was executed. No fees have been drawn from that retainer as of present. Undersigned counsel does *not* presently intend to file any fee applications for such post-confirmation work, insofar as Christopher Wayne Glenn (“Mr. Glenn”) is now a reorganized debtor and no longer a debtor in possession assuming the obligations of a “trustee,” 11 U.S.C. § 1184; 11 U.S.C. § 330(a)(1), and any compensation would thusly not come from Mr. Glenn’s bankruptcy estate, Fed. R. Bankr. P. 2016(a). However, for the avoidance of any appearance of impropriety, undersigned counsel is certainly willing to file a new fee application for work associated with the

now-pending motion to amend the plan of reorganization, and undersigned counsel will forbear from taking payment out of trust monies, for such work, until after the motion is fully adjudicated, so as to allow time for any party in interest to suggest a fee application ought to be first filed.

2. On August 2, 2024 (three days ago), a party in interest consulted with undersigned counsel about a matter wholly unrelated to this case. It is reasonably anticipated the party in interest will formally engage undersigned counsel as early as today. For reasons inherent in the nature of the anticipated representation and the variety of work undersigned counsel performs, no details thereof are properly sharable at the present time. However, (i) it bears emphasis that the representation is unrelated to this case and will not have any economic impact upon Mr. Glenn or any other party herein; and (ii) an updated disclosure will be filed if and when the representation in question becomes a matter of public record.

Respectfully submitted,

Dated: August 5, 2024

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[Certificate of Service on Following Page]

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 5th day of August, 2024, a copy of the foregoing was served electronically upon filing via the ECF system, with copies being thereby sent to:

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